



Omaha Public Power District  
444 South 16th Street Mall  
Omaha, Nebraska 68102-2247

November 15, 1999  
LIC-99-0102

U.S. Nuclear Regulatory Commission  
Attn: Document Control Desk  
Mail Station P1-137  
Washington, DC 20555

- References:
1. Docket No. 50-285
  2. Letter from OPPD (W. G. Gates) to NRC (Document Control Desk), dated August 6, 1999 (LIC-99-0072)
  3. ABB-Combustion Engineering Nuclear Power Report CE-NPSD-683, *Development of a RCS Pressure and Temperature Limits Report for the Removal of P-T Limits and LTOP Requirements from the Technical Specifications*

**SUBJECT: Plan for Approval of Pressure-Temperature Limits Report (PTLR) Methodology at Fort Calhoun Station**

Fort Calhoun Station (FCS) was the lead plant for the Combustion Engineering Owners Group (CEOG) effort to implement Generic Letter (GL) 96-03, "Relocation of the Pressure Temperature Limit Curves and Low Temperature Overpressure Protection System Limits," at selected CEOG member plants. In Reference 2, Omaha Public Power District (OPPD) withdrew an Application for Amendment of Operating License which proposed to relocate the pressure-temperature curves, the predicted NDTT shift curve, and the low temperature overpressure protection (LTOP) limits and values from the FCS Technical Specifications to an OPPD-controlled document entitled "RCS Pressure-Temperature Limits Report (PTLR)." The generic methodology for implementing the PTLR at CEOG plants was described in a CEOG topical report from ABB-Combustion Engineering Nuclear Power (ABB-CENP), which was included for NRC approval with the OPPD Application (Reference 3).

Following extensive communications with the NRC Staff and revisions of the Ref. 3 topical report during the acceptance review period, the OPPD Application for Amendment was withdrawn due to continued unacceptability to the Staff of the topical report and the plant-specific amendment request. OPPD's intent, as noted in Reference 2, was to incorporate changes acceptable to the NRC Staff and re-submit the Application for Amendment (including the revised topical report).

OPPD, the CEOG, and ABB-CENP subsequently agreed on a different approach, which has been verbally communicated to the NRC. ABB-CENP, on behalf of the CEOG, will submit the revised PTLR topical report independently and support NRC approval of the topical report.

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Following approval of the topical report, OPPD plans to submit a plant-specific Application for Amendment of Operating License that will reference the approved PTLR methodology. OPPD expects this to occur in the summer of 2000. Therefore, current NRC review of PTLR issues specific to FCS should be discontinued.

Please contact me if you have any questions.

Sincerely,



S. K. Gambhir  
Division Manager  
Nuclear Operations

TCM/tcm

c: E. W. Merschoff, NRC Regional Administrator, Region IV  
L. R. Wharton, NRC Project Manager  
W. C. Walker, NRC Senior Resident Inspector  
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